

### **REMARKS**

Claims 1-52 are pending in this application. Claims 1-2, 5-7, 20, 46-47, 49, and 51 are independent. In light of the remarks contained herein, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejections.

In the outstanding Official Action, the Examiner rejected claims 1-52 under 35 U.S.C. § 102(e) as being anticipated by *Fields et al.* (U.S. Patent No. 6,412,008). Applicant respectfully traverses this rejection.

### **PRELIMINARY COMMENTS**

Applicant is filing concurrently herewith a Request for Personal Interview. Prior to the Examiner's formal consideration of the arguments included herein on the record. Applicant respectfully requests the Examiner contact the undersigned to schedule and conduct an Interview with the Applicant's representative.

### **CLAIM REJECTIONS – Under 35 U.S.C. § 102**

In support of the Examiner's rejection to claim 1, the Examiner asserts that *Fields et al.* discloses obtaining intermediate processed image data by applying an editing process to the editing data in accordance with the edit-command information and transferring the intermediate processed image data to the client at the editing unit, citing Col. 6, lines 32-45. Applicant respectfully disagrees with the Examiner's characterization of this reference.

The disclosure of *Fields et al.* is directed to a system and method for cooperative client-server customization of web pages. At Col. 6, lines 32-45, *Fields et al.* discloses as follows:

Referring again to FIG. 4, the client then sends an HTTP request to a server (step 102). The HTTP request includes the user agent string, the corporate options, and the personal options. The client then waits to receive the requested file from the server (step 104). The file that is received has been customized or modified

according to the user agent string, and the requested corporate and personal options.

Next, the client checks to see if there is return customization information included in the returned file (step 106). If so, the client reads the return customization information (step 108). The client then performs further customization based on the return customization information, along with any other known user preferences and/or current conditions (step 110).

In contrast, the present invention as set forth in claim 1 recites, *inter alia*, an image editing method that is performed in an image editing system equipped with a client which has an edit command unit for applying a command to an edit image data and an image server. The method comprising obtaining intermediate process data by applying an editing process to the editing data in accordance with the edit-command information and also transferring the intermediate processed image data to the client, at the editing unit.

However, *Fields et al.* merely discloses the server receiving HTTP request from the client and obtaining the requested network file. The server reads the user agent's string (Step 1-4) and checks to see if the user agent's string is in its database. There is no teaching or suggestion in *Fields et al.* that is directed to obtaining intermediate processed image data by applying an editing process to the editing data in accordance with the edit-command information at the editing unit. As such, Applicant maintains that *Fields et al.* fails to anticipate claim 1 as *Fields et al.* fails to teach or suggest all the claimed elements.

Additionally, there is not teaching or suggestion in *Fields et al.* that is directed to generating command edit-command information at the edit-command unit and obtaining intermediate processed image data by applying and editing processed to the editing data in accordance with the edit command information at the editing unit. In addition, *Fields et al.* fails to teach or suggest transferring all editing information, which represents the one editing object corresponding to the inquiry, to the client, at the editing unit. Support for this argument may be found in Applicant's Reply filed January 9, 2006.

It is respectfully submitted that claims 3-4 are allowable for the reasons set forth above with regard to claim 1 at least based upon their dependency on claim 1. It is further respectfully submitted that claims 2, 5-7, 20, 46-47, 49, and 51 include at least one element similar to those disclosed above with regard to claim 1 and thus these claims, together with claims dependent thereon, are allowable for the reasons set forth above with regard to claim 1.


### **CONCLUSION**

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Catherine M. Voisinet (Reg. No. 52,327) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

By 

Marc S. Weiner

Registration No.: 32,181

BIRCH, STEWART, KOLASCH & BIRCH, LLP

8110 Gatehouse Road

Suite 100 East

P.O. Box 747

Falls Church, Virginia 22040-0747

(703) 205-8000

Attorney for Applicant